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December 6, 2012

Brian Jones  
Campaign Finance Analyst  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

RE: Defend America PAC (a multi candidate committee)  
Identification Number: C00325993

Reference: AMENDED JUNE MONTHLY REPORT (05/01/2012-05/31/2012) RECEIVED 07/15/2012

Dear Mr. Jones:

I am in receipt of and thank you for your letter dated November 1, 2012 regarding your review of the above referenced report and the amended reports filed by our committee on July 15, 2012.

1.As per our telephone conversation yesterday, the amended June monthly report filed on July 15, 2012 correctly reports receipts that were not properly disclosed due to clerical errors in the data entry process for the original report filed on June 16, 2012. During preparation of the July 2012 monthly report, it was discovered by the committee that four (4) contribution/deposit batches for the June monthly report were incorrectly entered on the FEC campaign software resulting in the batches not appearing correctly on the June monthly report. The error was discovered on July 15, 2012 and the committee filed an amended June monthly report on July 15, 2012 (the same day) to correctly report activity for June 2012. The amended report disclosed a substantial increase (\$204,250.00) because the four contribution batches were in the amounts of \$97,000, \$50,000, \$32,500 and \$24,750 resulting in a total of \$204,250. Three of the batches were for contributions received on 5/30/2012 and the fourth batch was for contributions in the amount of \$24,750 for contributions received on 5/9/2012. Because the contributions were received during the period of May 1, 2012 to May 31, 2012, the committee amended its report to correctly show the receipt of the contributions on it's June monthly report. The committee uses FEC campaign software that allows multiple contributions to be entered in batches/groups so that the clerk only has to enter the date once for all of the contributions in the batch/group, which saves time and usually helps to reduce data entry errors and transposing of numbers. However, if the date for the batch is entered incorrectly, then all of the contributions in the batch are wrong. The date for the batches were incorrectly entered for these four contribution batches, resulting in the campaign software not picking up the contributions for the June report when it was electronically filed. The error was discovered when the committee was preparing to file the next electronic monthly report. Immediately upon discovering the clerical error, the committee amended the June monthly report to correctly report and disclose the contributions as being received in May 2012.

Your letter also referenced increased activity two years ago as reflected on amended monthly reports for 2010 filed by the committee on February 16, 2011. In September 2011 the FEC requested additional information regarding the monthly report amendments filed on February 16, 2011 and the committee filed a Form 99 explaining why the committee amended the respective reports. It is my understanding from our telephone yesterday that the FEC is in receipt of the Form 99 filed by the committee on October 28, 2011 and that no further explanation of the amended reports or increased activity is necessary for the 2010 activity. Please reference the Form 99 filed on October 28, 2011 for further explanation of the increased activity referred to in your recent letter.

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2. With regard to your inquiry regarding contributions reported from Boeing PAC, the contribution received on May 9, 2012 in the amount of \$5,000 was correctly reported and not an excess contribution. However, the in-kind contribution reported as being received on March 26, 2012 from BoeingPAC in the amount of \$3,994.73 was incorrectly reported due to a clerical error. The in-kind contribution was received from Tim Keating, 1970 Rockingham Street, McLean, VA 22201 for a reception held in his home. Mr. Keating is employed by Boeing but the in-kind contribution was actually paid for and made by Mr. Keating individually. On December 5, 2012, the committee amended the April 2012 monthly report to correctly report the in-kind contribution. Since the clerical error and amendment involved a PAC contribution being changed to an individual contribution, the committee has also amended all of its subsequent reports since the April 2012 monthly report in order that the year to date totals on each subsequent report are correct.

Please do not hesitate to contact me should you need any additional information. Thank you again for your assistance in this matter.

Sincerely,

John Lloyd  
Treasurer

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